

# EXHIBIT A

**Re: Wealth Assistants | Invoice for motion for sanctions**

1 message

**Nico Banks** <nico@bankslawoffice.com>

Mon, Aug 26, 2024 at 2:20 PM

To: William Shibley &lt;william@lloydmousilli.com&gt;, joseph.ashby@offitkurman.com

Cc: "richard nerviglaw.com" &lt;richard@nerviglaw.com&gt;

Hi Bill and Joseph,

As a friendly reminder, the attached invoice is outstanding.

Also, we plan to issue the subpoenas soon (see the attached email), so if you would like to confer about them before we issue them, please let me know. In addition to the subpoenas described in the attached email, we also plan to issue a subpoena to Amazon requesting transaction records.

Thanks,

Nico Banks, Esq.

Banks Law Office, P.C.

Pronouns: he/him

Tel.: 971-678-0036

712 H St NE,

Unit #8571,

Washington, DC 20002

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On Sat, Jul 27, 2024 at 12:40 PM Nico Banks &lt;nico@bankslawoffice.com&gt; wrote:

Bill,

Please see the attached correspondence.

Regards,

Nico Banks, Esq.

Banks Law Office, P.C.

Pronouns: he/him

Tel.: 971-678-0036

712 H St NE,

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----- Forwarded message -----

From: Nico Banks <nico@bankslawoffice.com>

To: Allauna Gluski <allauna@lloydmousilli.com>, Lema Mousilli <lema@lloydmousilli.com>, Litigation <litigation@lloydmousilli.com>, Megan Weiss <megan@lloydmousilli.com>, William Shibley <william@lloydmousilli.com>, "richard nerviglaw.com" <richard@nerviglaw.com>

Cc:

Bcc:

Date: Sun, 28 Jul 2024 14:59:46 -0400

Subject: Re: subpoenas

With respect to the subpoena to Intuit, we would also like to request accounting records, which will also help us locate the assets at issue.

Regards,

Nico Banks, Esq.  
Banks Law Office, P.C.  
Pronouns: he/him  
Tel.: 971-678-0036  
712 H St NE,  
Unit #8571,  
Washington, DC 20002

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On Sun, Jul 28, 2024 at 2:58 PM Nico Banks <nico@bankslawoffice.com> wrote:

Bill,

I am writing again to confer about subpoenas directed to payment processors (such as Stripe, PayPal, TotalApps, Intuit, and Mercury). As I suggested before, we would like to issue revised subpoenas to those entities that request "records of transactions" in accounts controlled by the jurisdictional defendants. We think that request is clearly relevant, and indeed necessary, because in many instances it is the payment processors rather than the banks that possess the transactional records. Can you please let me know if you'd like to confer about that further?

Regards,

Nico Banks, Esq.  
Banks Law Office, P.C.  
Pronouns: he/him  
Tel.: 971-678-0036  
712 H St NE,  
Unit #8571,  
Washington, DC 20002

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On Fri, Jul 12, 2024 at 2:49 AM Nico Banks <nico@bankslawoffice.com> wrote:

Bill,

I am considering filing a motion asking the Court to reconsider the decision to quash the subpoenas issued to non-financial entities. The Court quashed those subpoenas on relevance grounds, which were not addressed in the briefings. I believe I can show the great importance of the subpoenas by explaining the records that the payment processors are required to keep, and explaining that the defendants used quickbooks to keep their financial records. I assume you'll oppose the motion, but please let me know if you'd like to confer about it further.

Also, in the event the Court denies the motion to reconsider, would you be open to narrowed subpoenas being issued to the non-financial entities? For example, could we issue subpoenas asking for just "records of transactions" for assets controlled by the individuals and entities listed on the previous subpoena? Do you have other limitations in mind?

Thanks,

Nico Banks, Esq.  
Banks Law Office, P.C.  
Pronouns: he/him  
Tel.: 971-678-0036  
712 H St NE,  
Unit #8571,  
Washington, DC 20002

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## 2 attachments



**2024.07.25 invoice for sanctions.pdf**

229K



**subpoenas.eml**

12K